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Attorneys for Plaintiff
AETNA LIFE INSURANCE COMPANY,
ON BEHALF OF LEHMAN BROTHERS
HOLDINGS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AETNA LIFE INSURANCE COMPANY,
ON BEHALF OF LEHMAN BROTHERS
HOLDINGS, INC.,

Plaintiff,

vs.

THOMAS KOHLER and DIANE KIMSEU
KOHLER,

Defendants.

Case No. C-11-00439-CW

**STIPULATION TO CONTINUE THE
DEADLINE TO FILE A MOTION FOR
ATTORNEY'S FEES AND COSTS**

This Stipulation to Continue the Deadline to File a Motion for Attorney's Fees and Costs is made and entered into by and among Plaintiff Aetna Life Insurance Company (the "Plaintiff") and Defendants Thomas Kohler and Diane Kimseu Kohler ("Defendants") (collectively, "Parties").

Pursuant to Federal Rule of Civil Procedure 54(2)(B)(i) and the Court's Order Granting Plaintiff's Motion for Summary Judgment (Doc. No. 50), Plaintiff may file a motion for attorney's fees within fourteen days of the entry of Judgment (Doc. No. 51) on November 7, 2011. Thus, Plaintiff's deadline to file a motion for attorney's fees and costs is November 21, 2011. The Parties have met and conferred on November 15, 2011 as required under Local Rule 54-5 and

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agreed that the Parties would benefit from additional time to further meet and confer regarding Plaintiff's attorney's fees. The Parties agree and stipulate that, subject to the Court's approval of this stipulation, the deadline for Plaintiff to file a motion for attorney's fees and nontaxable costs will be continued until November 28, 2011. No other deadlines in the case would be affected.

IT IS SO STIPULATED.

DATED: November 17, 2011

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By: /s/ Clarissa A. Kang
Clarissa A. Kang
Attorneys for Plaintiff
Aetna Life Insurance Company, on behalf of
Lehman Brothers Holdings, Inc.

DATED: November 17, 2011

THE DOLAN LAW FIRM

By: /s/ Christopher Dolan
Christopher Dolan
Attorneys for Defendants
Thomas Kohler and Diane Kimseu Kohler

I attest that my firm has obtained Mr. Dolan's concurrence in the filing of this document.

TRUCKER ♦ HUSS

DATED: November 17, 2011

By: /s/ Clarissa A. Kang
Clarissa A. Kang

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 21, 2011



Hon. Claudia Wilken
Judge of the United States District Court